

SHAWN HALBERT
California SBN 179023
Law Offices of Shawn Halbert
214 Duboce Avenue
San Francisco, California 94103
Telephone: (415) 703-0993
Facsimile: (415) 255-8631
shawn@shawnhalbertlaw.com

Attorney for Defendant
JONATHAN FLORES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 19-0584 RS
)	
Plaintiff,)	STIPULATION AND ORDER CONTINUING
)	CASE TO OCTOBER 20, 2020, AND
v.)	EXCLUDING TIME FROM SEPTEMBER 29,
)	2020 TO OCTOBER 20, 2020 UNDER THE
JONATHAN FLORES,)	SPEEDY TRIAL ACT
)	
Defendant.)	

STIPULATION

At the request of the defense and with no objection from the government, the defense requests that the status date of September 29, 2020 be continued to October 20, 2020 in order to allow defense counsel additional time to conduct investigation, meet with her client, and engage in settlement discussions with government counsel.

The parties submit that the time between September 29, 2020 and October 20, 2020 should be excluded based on effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties stipulate that the ends of justice served by the continuance outweigh the best interests of the public and the

///

///

1 defendant in a speedy trial.

2 IT IS SO STIPULATED.

3
4 DATED: September 25, 2020

SHAWN HALBERT
Counsel for Jonathan Flores

5
6
7 DATED: September 25, 2020

DAVID L. ANDERSON
United States Attorney

8
9 _____/s/
CHRISTINA LIU
Assistant United States Attorney

10
11
12
13 Attestation of Filer

14 I attest that I have the permission of the other signatories to this document to enter conformed
15 signatures on their behalf and to file the document.

16 DATED: September 25, 2020

_____/s/
SHAWN HALBERT
Counsel for Jonathan Flores

ORDER

For the reasons stated herein, IT IS HEREBY ORDERED that the status date of September 29, 2020 shall be continued to October 20, 2020 and that a time exclusion between September 29, 2020 and October 20, 2020 is warranted, and the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective preparation of counsel and would result in a miscarriage of justice, and the continuance is appropriate given the status of the case. 18 U.S.C. § 3161(h)(7)(B)(ii) and (iv).

IT IS SO ORDERED.

DATED: September 25, 2020


HONORABLE RICHARD SEEBORG
United States District Judge